

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION**

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| | : | Case No# 18-23538 |
| | : | Chapter 11 |
| | : | |
| | : | Date: August 22 nd , 2019 |
| In Re: Sears Holdings Corporation, | : | Time: 10:00 a.m. |
| et al. | : | |
| | : | |
| | : | NOTICE OF MOTION TO LIFT |
| | : | AUTOMATIC STAY |
| | : | |
| Tax ID# | : | |
| | -X | |

PLEASE TAKE NOTICE, that the undersigned will move before the Honorable Judge Robert Drain, Bankruptcy Judge for the United States for the Southern District of New York at the U.S. Bankruptcy Court located at 300 Quarropas St, White Plains, NY 10601 on August 22nd at 10:00 a.m. of that day or soon thereafter as counsel can be heard for an Order Dismissing the Chapter 11 Bankruptcy Case and such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE, that under Local Bankruptcy Rule 9006-1, any answering Affidavits shall be served to ensure actual receipt no later than three (3) days before the return date of this Motion.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief requested in this Motion must comply with the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the Southern District of New York, must be made in writing describing the basis therefore and must be received in the Bankruptcy Judge's chambers

and by the undersigned not later than three (3) days before the return date. Unless objections are received by that time, the order may be signed.

PLEASE TAKE FURTHER NOTICE, that a hearing shall be held before the Honorable Judge Robert Drain. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: New York, NY
July 22nd, 2019

_____/s/_____
Daniel M. Silvershein (dms-7669)
Attorney for the Creditor Vivian Hilken
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New York, NY 10018